

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION

IN RE: )  
SHEALA LAJEAN WATFORD ) CASE NO.: 19-05197-5-JNC  
Debtor. ) CHAPTER 13  
)

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**MOTION TO WITHDRAW AS COUNSEL**

**NOW COMES** Sarah Beth Withers, attorney for Sheala LaJean Watford (the “Debtor”), and hereby respectfully moves this Court to enter an Order permitting the undersigned to withdraw as counsel for the Debtor in the above captioned proceeding. In support thereof, the undersigned states as follows:

1. On November 8, 2019, the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code, in the Eastern District of North Carolina, Greenville Division.

2. The Debtor had previous counsel, Allen C. Brown of the law office of Allen C. Brown, P.A. (hereinafter “Mr. Brown”). Mr. Brown did prepare and file the Petition and Schedules in this case, did attend the 341 of Meeting of Creditors, and did represent the Debtor for the Confirmation of the Chapter 13 Plan.

3. The Debtor did seek to hire the undersigned counsel to be substituted as attorney of record for the Debtor on or about August 20, 2020.

4. Undersigned counsel has expended more than 42.00 hours in the representation and/or communications with the Debtor since August 20, 2020, including representation in a Motion to Approve Trial Payment Plan, and a Motion to Modify Plan and Approve Mortgage Modification.

5. Multiple grounds for withdraw exist pursuant to Rule 1.16(b)(1), (7), and (9) of the North Carolina Rules of Professional Conduct.

6. Despite the undersigned’s good-faith attempt to resolve matters with the Debtor, there remains irreconcilable differences that constitute good cause for withdrawal.

7. Withdraw of the undersigned counsel can be accomplished without any material adverse effect on the interest of the Debtor.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court grant this Motion to Withdraw as Counsel for the above-named Debtor.

This 12<sup>th</sup> day of November, 2021.

/s/ Sarah Beth Withers

Sarah Beth Withers, Attorney for Debtor  
NC State Bar No. 46510  
Inner Banks Legal Services, Inc.  
130A East 2<sup>nd</sup> Street, Washington, NC 27889  
Ph: (252) 495-0585 | Fax: (252) 565-6921  
sbwithers@ibxlegal.org

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**NOTICE OF MOTION TO WITHDRAW AS COUNSEL**

The attorney for the above named Debtor has filed a Motion to Withdraw as Counsel for the Debtor in the above referenced case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the motion, then within **14 days** or on or before **November 29, 2021**, you or your attorney must file with the court, pursuant to Local Rule 9013-1 and 9014-1, a written response, an answer explaining your position, and a request for hearing at: Clerk, U.S. Bankruptcy Court, Post Office Box 791, Raleigh, N.C. 27602.

If you mail your response to the court for filing, you must mail it early enough so that court will **receive** it on or before the date stated above. **You must also mail a copy to the following:**

Inner Banks Legal Services, Inc.  
Attn: Sarah Beth Withers, Esq.  
130A East 2nd Street  
Washington, NC 27889

Chapter 13 Trustee  
Attn: Joseph A. Bledsoe, III  
Post Office Box 1618  
New Bern, NC 28563

If a response and a request for hearing is filed in writing on or before the date set above, a hearing will be conducted on the Motion at a date, time and place to be later set and all parties will be notified accordingly. If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in this Motion and may enter an order granting that relief.

This the 12<sup>th</sup> day of November, 2021.

/s/ Sarah Beth Withers

Sarah Beth Withers, Attorney for Debtor  
NC State Bar No. 46510  
Inner Banks Legal Services, Inc.  
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**CERTIFICATE OF SERVICE**

I, Sarah Beth Withers, of Inner Banks Legal Services, Inc., 130 A East 2<sup>nd</sup> Street, Washington, North Carolina, 27889, certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and

That on the 12<sup>th</sup> day of November, 2021, I certify that I have mailed the Motion to Withdraw as Counsel to the non-CM/ECF participants as set out below by first class / certified mail.

I certify under penalty of perjury that the foregoing is true and correct.

This the 12<sup>th</sup> day of November, 2021.

/s/ Sarah Beth Withers

Sarah Beth Withers, Attorney for Debtor  
NC State Bar No. 46510  
Inner Banks Legal Services, Inc.  
130A East 2<sup>nd</sup> Street, Washington, NC 27889  
Ph: (252) 495-0585 | Fax: (252) 565-6921  
sbwithers@ibxlegal.org

**RECIPIENTS:**

Name & Address of Recipients, & Type of Service (CM/ECF, U.S. Mail, or Certified)

Sheala L. Watford  
Post Office Box 924  
Snow Hill, NC 28580  
*Via Electronic Mail*

Joseph A. Bledsoe, III  
Chapter 13 Trustee  
Post Office Box 1618  
New Bern, NC 28563  
*Via CM/ECF*